



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 5 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Request for Time Extension for Peach and Almond Crop
Residue Studies in 3/31/87 Maneb DCI. Pennwalt Corp.
Letter of 7/6/87 [RCB No. 2559] No Accession No.

FROM: Martin F. Kovacs Jr., Ph.D., Chemist *Martin F. Kovacs Jr.*
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THRU: Charles L. Trichilo, Ph.D., Chief
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TO: Joan Warshawsky
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and

Henry Jacoby
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Introduction

RCB has been asked by the DCI staff to review and comment on the validity of the time extension request for peach and almond crop residue studies as specified in the July 6, 1987 letter by Joseph D. Panetta, Manager, Regulatory Affairs, Pennwalt Corp., to J. Warshawsky SRB, RD. Specifically in regard to the time extension request for peaches, the DCI staff has posed the following question to RCB; "could peaches have been treated in more northern geographical area with later application schedule?"

Conclusions

1. RCB concludes that normal EBDC treatments to almonds would have already begun when the 3/31/87 Data Call-In letter was issued.

2. RCB concludes that peaches could have been treated in more northern regions (NJ, WA, PA, MI, NY, CO) with later application schedules in the 1987 growing season following receipt of the 3/31/87 Data Call-In letter.

Recommendations

RCB defers to RD on the administrative decision of granting the requested time extension.

Basis for Recommendations

A.) Present Submission: Joseph D. Panetta (Pennwalt) letter dated 7/6/87

Registrant's Remarks (partial)

The Storage Stability DCI requests new Maneb and ETU residue data in or on all crops having a tolerance listed in 40 C.F.R. § 180.110. Pennwalt commits to generating data on the following crops:

1. sugar beet tops
2. beans (succulent form)
3. broccoli
4. cabbage
5. lettuce
6. beans (dry form)
7. grapes
8. onions
9. sweet corn
10. bananas
11. cucumbers
12. summer squash
13. tomatoes
14. potatoes

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On last page of letter

* Pennwalt Corporation requests an extension until September 1, 1988 of the March 31, 1988 deadline for submission of crop residue data on the following crops:

1. almonds
2. peaches

The extension is necessary because the Data Call-In Notice was received subsequent to the time when these crops are treated with maneb (early February in California and early March in the southern U.S.).

B.) RCB Comments/Conclusions

1. Almonds

The Pennwalt Corp. request for a time extension from the 3/31/88 DCI deadline to 9/1/88 for submission of almond residue data in RCB's opinion is justified from scientific considerations. This opinion is based on information on almonds obtained from RCB's Cultural Practices File which indicates that California is the only important almond producing state in the USA and all fungicides (including maneb) are applied to almond trees during February and March; harvest is from August through October. Additionally, the 1985 almond residue trials submitted by the MTF from 6 different CA locations all reflected almond trees treated with maneb according to label directions at the "popcorn" stage (2/26 to 3/6) and at the full bloom stage (3/4 to 3/16). Therefore, at the time that the Storage stability DCI Notice was issued (3/31/87) the normal maneb treatment schedule on almond trees would have been well underway.

Notwithstanding RCB's opinion regarding the scientific validity of Pennwalt's requested time extension for the submission of almond residue data, RCB defers to RD on the question of administratively granting the requested time extension in light of official comments made by the Agency at the 4/16/87 meeting with the MTF as follows:

- ° The time frames are tight for the Storage Stability Call In but the Agency feels they are achievable.
- ° The Agency will take a hard line on extensions beyond March 1, 1988 for the residue data required in the Storage Stability Call In.

2. Peaches

In response to the question posed above by the DCI staff; it is RCB's opinion that peaches could have been treated in a more northern geographic area (NJ, WA, PA, MI, NY and Co) with later application schedules in the 1987 growing season by Pennwalt Corp. According to RCB's Cultural Practices File (peaches) the usual harvest date for peaches in those states begins in July and August and ends in September and October. Allowing for the maximum initial treatment to harvest interval of 80 to 145 days ("red bud" stage to harvest for maneb treatments) initial maneb treatments in those states could have been made to late season peaches after issuance of the 3/31/87 DCI Notice. In fact, late season harvested peaches (September to October 5th) could also have been treated with maneb in California following issuance of the DCI Notice. Furthermore, 1986 peach residue trials submitted by the MTF from 2 GA locations where peach trees were treated with maneb according to label directions and harvested in early July, reflected initial maneb applications at the "red bud" stage of development on April 30th and May 7th, again following the date that the DCI Notice would have been issued.

Therefore, in RCB's opinion, the Pennwalt Corp. request for a time extension from the 3/31/88 DCI deadline to 9/1/88 for submission of peach residue data is not justified from scientific considerations.

cc: A. Barton - HED, W. Boodee, E. Zager, Reviewer - M. Kovacs,
S.F., R.F., Ellenberger, SRB/RD, PMSD/ISB
RDI: J. Onley, 7/31/87; R.D.Schmitt, 8/3/87
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